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October 26, 2021

VIA ECF

Honorable Robert Kugler, U.S.D.J.
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US
Courthouse
1 John F. Gerry Plaza, Courtroom 4D
4th and Cooper Streets
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower, Suite 1800
Philadelphia, Pennsylvania 19103-7360

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs in advance of the October 27, 2021
Discovery Hearing and Case Management Conference.

1. Scheduling of Baohua Chen's Deposition

Since September, Plaintiffs have asked ZHP to advise when Baohua Chen would be available for his deposition. ZHP recently advised that "the Chinese government has not yet made a decision as to the issuance of a travel permit for Mr. Chen to travel for Macao for his deposition." (Ex. A hereto). Plaintiffs then asked when ZHP expected to hear from the Chinese government on this permit, and ZHP has yet to respond. *Id.* Plaintiffs believe the deposition should be scheduled promptly.

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2. Status Update on Newly-Named Class Representatives

Plaintiffs have provided deposition dates for all new named plaintiffs in the class complaints. Some depositions have been taken already and others are scheduled to be taken within the Court's deadline. Plaintiffs have been working with Defendants on scheduling and records-related issues as they arise, and will continue to do so to work towards timely completion of all of these depositions.

3. Status Updated on Bellwether Plaintiff and Treater Depositions

The Parties agreed to depose two health professionals for each of the 28 bellwether plaintiffs: one physician who prescribed the Valsartan used by the plaintiff as well as a health professional who treated the plaintiff's cancer. To date, 28 depositions have already occurred with another 23 scheduled through next Friday, November 5, 2021. Of the intended 56 depositions, the remaining 5 physician depositions that will likely not occur by next week, are being discussed between the respective parties in order to accommodate the doctors' and attorneys' schedules; however, some may still occur before the end of next week. We believe the Parties have worked diligently to maintain the court's schedule and will be able to resolve the outstanding issues promptly.

4. One-Week Extension for Plaintiffs' Class Certification Briefs

Plaintiffs would like to discuss a potential one-week extension of the class certification deadline on November 3, 2021. Plaintiffs would not seek to move any other deadline (e.g., *Daubert* briefing on general causation experts). Plaintiffs would expect the other class-related deadlines (opposition and reply) could be adjusted by a commensurate amount of time. Plaintiffs have not yet had an opportunity to meaningfully confer with Defendants about this request.

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5. Plaintiff Fact Sheet Deficiencies and Orders to Show Cause

Plaintiffs will be prepared to discuss this issue at the case management conference.

Respectfully,



ADAM M. SLATER